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NCH CORPORATION

Environmental and Regulatory Affairs Department

May 8, 1989

Mr. Charles J. Marsden
Vice President - Finance
Crompton & Knowles Corporation
345 Park Avenue
New York, NY 10154

Re: KEM Manufacturing
EPA CERCLA 104(e) Request
Artel Chemical Site

Dear Mr. Marsden:

In accord with the provisions of the KEM Manufacturing Asset Purchase Agreement of December 9, 1986, between NCH Corporation and Crompton & Knowles Corporation, enclosed please find the original CERCLA section 104(e) information and document request from EPA Region III regarding the Artel Chemical Company site in Nitro, West Virginia. A copy of our correspondence with EPA on this matter is also enclosed.

I was informed by the EPA contractor, Acumenics Research, that this request was sent to KEM on the basis of an invoice dated March 14, 1986, indicating shipment of dibutyl thiourea to the Tucker, Georgia, facility. I was further informed that the facility operated under the name of Roberts Chemical from 1953 to 1975, as Pike Chemical from 1969 to 1986, and as Artel Chemical from 1986 to 1988.

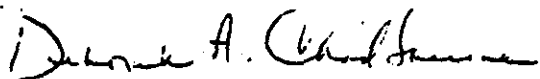
Since the basis for the 104(e) request occurred during March 1986, it is NCH's understanding that Crompton & Knowles will undertake the defense and/or settlement of this matter. Please confirm receipt and handling of this claim.

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If there are any questions, please give me a call. My telephone number is 214/438-0062.

Sincerely,



Deborah A. Chadbourne

Enclosures

cc: Edward J. Waite, III, Crompton & Knowles
Joe Cleveland, NCH Corporation
Acumenics Research & Technology, Inc.

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